

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELSEVIER INC., ELSEVIER B.V., ELSEVIER
LTD.

Plaintiffs,

v.

SCI-HUB d/b/a WWW.SCI-HUB.ORG, THE
LIBRARY GENESIS PROJECT d/b/a
LIBGEN.ORG, ALEXANDRA ELBAKYAN,
JOHN DOES 1-99,

Defendants.

Index No. 15-cv-4282 (RWS)

**SUPPLEMENTAL DECLARATION OF ANTHONY WOLTERMANN IN SUPPORT OF
PLAINTIFFS' APPLICATION FOR AN ORDER TO SHOW CAUSE FOR A
PRELIMINARY INJUNCTION**

I, ANTHONY WOLTERMANN, declare as follows:

1. I submit this Supplemental Declaration in support of Plaintiffs' reply brief in support of their application for entry of a preliminary injunction.

2. Attached hereto are true and correct copies of the following, along with English translations thereof:

- Exhibit A – A July 13, 2015, post by Elbakyan to the Sci-Hub VK page, accessible at vk.com/sci_hub?w=wall-36928352_3511, which when translated into English, reads in part “*Sci-Hub is fighting mainly for the free, unrestricted, and large-scale distribution specifically of knowledge and academic/educational information and is not engaged in*

other issues. We will continue to upload articles, even though most are already uploaded, and now we need to ensure their legalization.”

- Exhibit B – A July 13, 2015, post to the Sci-Hub VK page, accessible at vk.com/sci_hub?w=wall-36928352_3524, which when translated into English, read in part “***Guys, there’s this great site – Google Books! It’s great, but greedy – it doesn’t show all the pages of a book. But there are whiz kids who know how to get around those restrictions. Kostyantín Koul Terner Rakhno is working on that now and looking for people with various levels of experience to work together with him on that.***”

3. Attached hereto as Exhibit C is the affirmation of Robert Lendensky, Director of Business Development at Transperfect, certifying the authenticity of Exhibits A and B above, and to the accuracy of the translations thereof.

4. Attached as Exhibit D is a true and correct copy of the WHOIS record for sci-hub.org, retrieved August 18, 2015.

5. Attached as Exhibit E is a true and correct copy of a splash page that was presented to visitors to sci-hub.org as it appeared on July 20, 2015. This splash page called for donations either by Bitcoin or by Skrill to Elbakyan’s personal email account. The splash page also states that “***Since the project started in 2011, we have distributed tens of millions of research papers for free. And we work to increase these numbers.***”

6. Attached as Exhibit F is a true and correct copy of the WHOIS record for sci-hub.club, retrieved August 18, 2015.

7. The WHOIS records for sci-hub.org and sci-hub.club indicate that both domains are hosted at the same IP address: 31.184.194.81.

8. Attached as Exhibit G is a true and correct copy of the webpage available at sci-hub.org/donate, retrieved July 13, 2015, which provides a Bitcoin address at which users may “donate” to Sci-Hub.

9. Attached as Exhibit H is a true and correct copy of the WHOIS record for appliedsciencefreelibraryguide.org, retrieved August 18, 2015.

10. Attached as Exhibit I is a true and correct copy of the WHOIS record for libgen.org, retrieved August 18, 2015.

11. Attached as Exhibit J is a true and correct copy of the WHOIS record for elibgen.org, retrieved August 18, 2015.

12. Attached as Exhibit K is a true and correct copy of the WHOIS record for libgen.info, retrieved August 18, 2015.

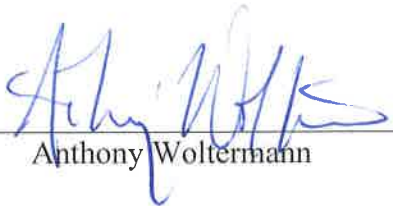
13. Attached as Exhibit L is a true and correct copy of the WHOIS record for bookfi.org, retrieved August 18, 2015.

14. Attached as Exhibit M is a true and correct copy of the appliedsciencefreelibraryguide.org homepage, retrieved July 13, 2015.

I declare under penalty of perjury that the foregoing is true and correct.

Dated August 18, 2015.

By:


Anthony Woltermann